

United States Government

Department of Energy

memorandum

Oak Ridge Office

DATE: 9/20/05

REPLY TO

ATTN OF: EM-94:Perkins

SUBJECT: SITE ACCESS TRAINING POLICY

TO: All Environmental Management Staff

It is my responsibility to assure that all Department of Energy Environmental Management (EM) staff are properly trained for work areas that they must access in order to carry out their work responsibilities. An alternative to training which assures individual safety is the use of trained escorts when entering controlled access areas. While I recognize that we need to balance training requirements with the amount of time spent in controlled areas, it is my belief that the use of escorts should be minimized. In order to assure consistent application of requirements for everyone, attached is a site access training policy which will be followed by EM personnel. Many of you are already trained to the requirements in this policy. For those of you that require training, I will expect a reasonable but aggressive schedule to get it done. I will also expect everyone to keep their training up to date.

Please work with your supervisor to agree on the level of training you require and a schedule for completion. If you need any support with your training needs, the training coordinator is Steven Oldham who can be reached at 576-7070.

S. H. McCracken

Stephen H. McCracken
Assistant Manager for
Environmental Management

Attachment

cc w/attachment:
Terry Allen, SE-312
Larry Kelly, SE-30

EM-94:Perkins:576-2552:wb:576-4452:9/19/05:N:TSAD/NOSPT/Perkins/Site Access Training Policy Memo/revised 9/20/05 per McCracken/er

Concurrence
Rtg. Symbol EM-91
Initials <i>Perkins</i>
Date <i>9/19/05</i>
Rtg. Symbol EM-91
Initials <i>Jackson</i>
Date <i>9/19/05</i>
Rtg. Symbol EM-90
Initials <i>Boogus</i>
Date <i>9/19/05</i>
Rtg. Symbol EM-90
Initials <i>McCracken</i>
Date <i>9/20/05</i>
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DOE-EM Site Access Training Requirements

The Accelerated Cleanup Program involves a wide range of activities with the potential for exposures to hazardous and radioactive materials. As part of Integrated Safety Management, all staff must be aware of the potential for exposures as they execute their responsibilities in this work environment. Because Department of Energy Environmental Management (DOE-EM) staff responsibilities range from work in offices to oversight of hazardous field operations, the potential for exposures and the requirements governing training for specific work activities vary considerably. To ensure consistent and appropriate site access training the guidelines outlined below for radiological and hazardous waste work should be used by Project Directors in determining individual training needs.

General Employee Training and Radiological Worker Training

Most of the DOE-EM staff will require access to “Controlled Areas” at least periodically. A Controlled Area is defined in 10 CFR 835 as an area managed to protect individuals from exposure to radiation and/or radioactive material. Most EM field sites are within Controlled Areas. The “Radiological Areas” are posted areas within Controlled Areas where there is more significant potential for exposure to radiation and/or radioactive materials. Some EM staff requires access to Radiological Areas as part of their oversight responsibilities. The following training guidelines apply to Controlled and Radiological Area access:

- Individuals who routinely access (40 hrs/yr or more) Controlled Areas should complete General Employee Training (GET). The GET training is offered electronically by Bechtel Jacobs Company LLC (BJC) as Paducah/Park/Portsmouth Worker Training (P3WT).
- Individuals who only enter Controlled Areas on an occasional or limited basis (<40 hrs/yr) should read and sign the Radiological Site Orientation (RSO) pamphlet. This training pamphlet provides basic orientation information and is available at the Site Access Center at Portal 2 of East Tennessee Technology Park.
- Individuals who need to enter Radiological Areas on a routine basis (40 hrs/yr or more) should complete Radiological Worker I or II (RW I/II) training. This training provides detailed instruction on radiological work requirements for areas that involve exposure to radiation (RW I), or both radiation and contamination (RW II). This level of training is applicable to Facility Representatives, staff who perform assessments in radiological areas, and Project/Program Managers who need to routinely enter radiological areas. Completion of RW I/II is normally required before assignment of a BJC blue thermoluminescent dosimetry (TLD).
- Individuals who only occasionally (<40 hrs/yr) enter some Radiological Areas, and do so with a trained escort do not need RW I/II but still must complete GET and obtain a blue TLD badge. A blue TLD for limited management access to radiological areas can be issued upon request to the radiological controls organization. Note that additional training may be required for certain areas but this will be noted on the Radiation Work Permit. Also, some radiological areas (e.g., high contamination areas, high radiation areas) can only be accessed after completion of RW I/II training.

Hazardous Waste Worker Training (HAZWOPER) - Initial and Refresher

- Individuals who are involved in oversight of field activities must review each work activity to determine whether the training requirements specified in 29 CFR 1910.120 are applicable. In general, unless it can be demonstrated that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards (associated with the hazardous waste work), then the HAZWOPER training requirements (initial and refresher) apply. Individuals that are routinely involved in field oversight activities (such as Facility Representatives and certain assessment and project/program management personnel) should have HAZWOPER training.